

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
v.)	
)	No. 4:21 CR 00311 MTS
)	
PORSHIA L. THOMAS,)	
)	
Defendant.)	

**MOTION TO SET CASE FOR CHANGE OF PLEA
AND VACATE STATUS CONFERENCE**

Comes now Defendant, Porshia Thomas, by and through her attorney, Mark A. Hammer (“counsel”) and respectfully requests that Court set this matter for a change of plea on or near June 17, 2022, and that the status hearing previously scheduled for May 3, 2022, be vacated in favor of that hearing.

Counsel spoke with AUSA Wiseman, and the parties today reached a resolution in this matter and should be able to present the final, signed paperwork to the Court this week in preparation for a plea in June. Counsel spoke with the Court’s clerk, and it was suggested that June 17 appeared to be a good day for the Court. The Government agrees to the proposed continuance for a change of plea.

For these reasons, Defendant – with consent of the Government – respectfully requests that the status conference on May 3 be vacated and the matter be scheduled for a change of plea hearing on or near June 17. Counsel has a sentencing with Judge Ross at 11:00 that morning but is otherwise available the day on June 17.

Defendant waives her right to a speedy trial pursuant to 18 USC § 3161.

Respectfully submitted,

/s/ Mark A. Hammer

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CERTIFICATE OF SERVICE

I certify that, on May 2, 2022, a copy of this document was electronically filed with the Clerk of Court, and served on all counsel of record, by the CM-ECF system.

/s/ Mark A. Hammer
